

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

NATALIE A. MATHER,
General Delivery.

24-cv-123 (PAM/JFD)

U.S. Post office,
JACKSON, MN 56143,
Plaintiff,

VS.

UNITED COMMUNITY
ACTION, a Minne-
-SOTA CORPORAT-
-ION, LACEY DAVIS,
in her official
capacity, DEB
BRANDT, in her
official capacity,
and COURTNEY
NEWGARD, in
her official
capacity, jointly,
Defendant(s).

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JAN 16 2024

CLERK
U.S. DISTRICT COURT
MINNEAPOLIS, MINNESOTA

SCANNED

JAN 16 2024

U.S. DISTRICT COURT MPLS

CIVIL COMPLAINT

(1)

comes now the Plaintiff party in the above styled action and does show cause for complaint as follows:

(1) This is an action sustained by, NATALIE A. MATHER, hereinafter Plaintiff MATHER, and SUES the defendant's jointly and in their official capacities, UNITED COMMUNITY ACTION, a Minnesota corporation, LACY DAVIS, in her official capacity, DEB BRANDT, in her official capacity, and COURTNEY NEWGARD, in her official capacity, alleging:

(A) A common scheme.

(B) Racketeering.

(C) Unlawful concealment of federal funding!

(D) Abuse of process.

(C) civil conspiracy.

(2)

(D) A conspiratorial predicate act.

(E) A common purpose to defraud.

(F) conspiracy to commit fraud!!

(G) civil violations of the Federal Racketeer Influenced and corrupt organizations Act, (Federal Rico)!

(H) A pattern of racketeering with a common purpose to commit fraud!!!

(2) Plaintiff NATALIE A. MATHER, ("MATHER") brings this civil complaint for fraud, civil conspiracy to commit fraud, abuse of process, and civil violations of the Federal Racketeer Influenced and corrupt organizations Act 18 U.S.C. § 1964(c) ("Federal Rico") !!!

NATURE OF THE CASE

(3) This is an action alleging fraud, civil conspiracy to commit fraud, abuse of process, abuse of federal funding, unlawful concealment of federal funds, and racketeering, all arising from a scheme between joint and combined defendants with a pattern of racketeering and a common purpose to defraud it which were in fact designated and implemented to defraud clients, here Victim, RATHER, of entitled services of United Community Action, include its designees and employees!

(4) Specifically, UNITED COMMUNITY ACTION, a corporate enterprise has, and still continues to engage into a pattern of racketeering with an intention- al, and common purpose to defraud not solely the federal government, concisely the United States Department of Treasury - federal funding grant

division, however, a large
 numeration of JACKSON MINNES-
 -OTA community action client's,
 concisely plaintiff MATHER within
 this specific case/lawsuit has
 most fraudulently been deprived
 of certain services so falsely
 claimed and asserted to be
 provided by United community
 action in light of personal
 financial gain in assets from
 a federal funding grant to which
 United community action, Deb
 Brandt, and supervisory personnel-
 Courtney Newgard, jointly and
 together as a corrupt enterprise
 submitted a false and frivolous
 federal grant application,
 most falsely asserting to the
 federal government that any
 and all person's seeking heat-
 -ing assistance during harsh
 winter months until the concl-
 -usion of April would be
 automatically entitled to a
 payment to the city of Jackson
 Utilities department in light
 of a utility deposit, including
 the client's MATHERS heating
 bill being paid each month

thereafter by united
community action in Jackson-
Minnesota!

(5) Defendant's, jointly, in the
District of Minnesota, willfully
and knowingly did combine,
conspire, confederate, and agree
together and with each other to
commit fraud and a common scheme
in a joint effort and a severe
conspiratorial predicate act,
with a common purpose to
defraud!!! ("concealment of
federal grant funds")!

(6) Nature of the case is
hereby concluded, as part and
object of the joint conspiracy
that these defendant's, knowingly
having devised and intending to
devise a scheme and artifice to
defraud, and for the purpose of
obtaining money from federal
funding, and from community
donations by means of false
and fraudulent pretences,
representations, and false and
frivolous promises would and did
cause by false means of radio,

and television communication
in interstate commerce,
writings, signs, signals, photo's
and news letter's for the sole
purpose of executing such of a
scheme and artifice in severe
violation of title 18, united
states code to wit, these
joint defendant's in fact
agreed jointly and together to
defraud not only the federal
government, thus, it's client's,
here concisely Plaintiff MATHER,
by misappropriating those client's
MATHER, federal funds and in
fact utilizing those specific
funds in which to only pay the
salary's to a widespread numer-
-ation of united community
action employee's, rising as
clear fraud!!!

(7) Pursuant to the federal
RICO statutes, the statute in
fact provides much more power
for a litigant to ask more
questions to a defendant party
during a civil jury trial process,
where here federal RICO applies

(7)

where the aspects of abuse
of "federal funding" is in
fact predicated upon!

PARTIES

(8) PLAINTIFF NATALIE A.
 MATHER, is current requester of
specific services to be provided by
a private corporate entity and an
enterprise at which receives
federal funds as to a federal
grant that clearly stipulates
within the federal grant
application falsely submitted
by united community action,
that during harsh winter months
until the conclusion of
April, that concise entity will
in fact furnish financial
heating services and a utility
deposit to all of those in need!

19) Corporate defendant's, United Community action is in fact a corporate enterprise at which receives a large amount of federal funding from the United States government in light of an application seeking a federal grant with false and frivolous promises stipulated within the application for federal funds, with its failure in which to comply and deliver such heating assistance to client's in sincere need!

(10) capacity defendant, LACEY DAVIS, acts within her official capacity as a self sufficiency case manager under the umbrella and oversight of the United Community action in Jackson-Minnesota, and pursuant to specific funds from a federal grant, DAVIS is in fact charged by federal statute in which to ensure proper distribution of those funds to those in need of heating assistance without any such interference, delay, or concealment of the federal

granted funds!

(11) Capacity defendant, DEB BRANT, acts in her official capacity as the chief executive officer over the entire and widespread corporate enterprise of the united community action entity and obtains oversight of defendant's DAVIS and NEWGARD!

(12) Capacity defendant, COURTNEY NEWGARD, acts within her official capacity as primary supervisor over the concise Jackson - Minnesota office of the united community action entity, and in light of federal funding, she is in fact charged by federal statute in which to comply with and to properly distribute those funds to those in sincere need of heating assistance!

(10)

JURISDICTION AND VENUE

(13) This federal court obtains subject matter jurisdiction over this case pursuant to civil RICO - 18 U.S.C. § 1964(c).

(14) The corporate enterprise here sued is in fact federally funded, and is in severe violation and infringement of a federal contract upon which false pretenses were in fact provided within the original application seeking a federal grant in a corrupt venue for personal financial gain by joint defendants! (An enterprise)!

(15) corporate defendant's obtains its principal place of business within the confines of the state of Minnesota, and in fact exists as a corporate enterprise in severe violation of interstate commerce under (RICO)!

(16) capacity defendant, LACEY DAVIS is a citizen and resident of the sole state of Minnesota, and has resided in Minnesota at all times material to this action!

(17) capacity defendant, DEB BRANDT, is a citizen and a resident of the sole state of Minnesota, and has resided in Minnesota at all times material to this action!

(18) capacity defendant, COURTNEY NEWGARD, is a citizen and a resident of the sole state of Minnesota, and has resided in Minnesota at all times material to this action!

(19) The damage amount in dispute is in excess of, \$75,000.

(20) Venue is proper in the District of Minnesota because each event giving rise to this action occurred in the District of Minnesota. 28 U.S.C. § 1391.

(12)

(12) The ingredients of this
case is predicated upon the
civil aspects of RICO where a
pattern of racketeering exists
where joint defendant's have
acted with a common purpose
to defraud not only the United
States Government, thus, a large
numeration of client's, here
in this concise case Plaintiff
MATHER, in a corrupt turn and
twist in an avenue in which to
unlawfully elude all client's,
here MATHER, in even so much
as to obtaining ("access") to
an official uniform applica-
-tion in which to be submitted
back into the administrative
offices of United Community
Action, and to the initial
intake personnel, LACEY DAVIS!
(A federally funded corporation
and enterprise)!

STATEMENT OF FACTS

(122) corporate defendant's, United Community Action, an enterprise, obtains an unlawful and fraudulent custom, practice, and policy, where it is in fact predicated upon a pattern of a corrupt turn and twist and in a pattern of racketeering, in which to initially unlawfully conceal an application in which to access federal funds in light of obtaining financial heat assistance from United Community Action where an official application form is in fact ("always") upon a pattern interfered with and in fact denied even prior to a client, here MATHER, obtaining a fair opportunity in which to properly assert her concise needs and to establish within an entitled application that she/MATHER, in fact meets procedural threshold in which to access federal funds for heating assistance!

(123) Despite being federally funded, United Community action unlawfully and in a corrupt conspiratorial predicate act engages into the unlawful concealment of those concise funds and in a corrupt scheme utilizes those specific federal funds as to sole financial gain only in which to pay their own salaries!!! A severe predicate act of racketeering here rises! Here alone exists where joint defendant's have acted with a common purpose in which to defraud!!

(124) Sufficing a cause of action of abuse of process, here in fact exists where defendant's, jointly, and together, upon a pattern unlawfully conceal client entitled federal funds of a requesting client, here MATHER, where in a corrupt turn and twist in which to unlawfully hinder and interfere in an early and premature denial and even so much as to

(15)

refusing a client, here
MATHER any access to an
official application seeking
those federal funds for winter
heating assistance, violates
the process upon which these
defendants ensured to the
United States Government
within their initial applic-
-ation for a federal financ-
-ial grant, the information
and promises within the federal
application obtains the fruits
of fraudulent information as
to concisely what criteria and
threshold at which a client
would need to meet sufficing
obtaining access of financial
services such in this case
heat and energy assistance!
The false advertised criteria
for a seeking client to meet
United community actions standard
for emergency heating assistance
was in fact of a very low
threshold at which were solely
provided within their federal
grant application as a scheme
of false and misleading promises
and frivolous information

also provided by united commu-
nity action to other Local
church's and to the general
public in widespread publicized
news letter's in frivolous and
misleading, false, and redund-
ant information and promises
solely in a corrupt avenue in
which to access only financial
gain for the sole and primary
benefit of paying their own
salaries!!! clear fraudulent
pretenses rises here as a
clear predicate act of racket-
teering with clear knowing
and intent at the hands of all
joint defendant's! An act here
of intentionally misappropriat-
ing those financial provider's
the united states Government,
Local Jackson church's, and
private area citizen's, in a
corrupt and fraudulent avenue
sustaining their own financial
gain!

(25) The fruits of this specific nature of case for fraud is in fact predicated upon the civil aspects of the federal RICO statutes, where a pattern of racketeering exists where joint defendant's have acted with a common purpose to defraud, not only the United States Government in a federal funding scheme, thus a large numeration of church's and client's, such as here in this concise case MATHER, in a corrupt turn and twist in an avenue in which to unlawfully elude all client's, here MATHER, in even so much as to obtaining ("access") to an official Uniform Housing Assistance application in which to be submitted back into the administrative offices of the United Community Action entity in Jackson - Minnesota, and to be submitted directly to the initial intake personnel, LACEY DAVIS! (A federal funded corporation and enterprise!)

VIOLATIONS OF INTERSTATE COMMERCE

(26) A material fact necessary in order to cause the state-ments, artifice, fraudulent pretenses, deceit, and misl-adding written quotes and assertions made and based untrue with its common practice and purpose, course of business from other states which in fact operated and continued to operate as a fraud and deceit upon foreign state person's, church's, and other charities, in severe violation of title 18 U.S.C. § 1964 (c) RICO, to wit, defendant's, DAVIS, BRANT, and, NEWGARD, jointly, agreed together to defraud the United States Government federal grant system, and its potential clients seeking heating assistance during harsh winter months in a joint conspiratorial predi-cate act intending with clear knowing and intent to post a volume of out of state flyers,

mailed over the state line
news letter's, and internet
postings to foreign states in
solicitation of financial
donations to united community
action in Jackson-Minnesota
by and in a corrupt avenue of
misappropriating those donor's
funds for utility and heating
deposits and utilizing most
fraudulently those donated
funds to only administrative
office expenses, official
vehicle fuel, and to pay
their personal financial
salaries and refusing to
actually assist those in need as
was promised under false pretense.
A clear predicate act of
recklessness here exist with
a common purpose in which to
defraud! A plausibility showing
here rises where these combined
and joint defendant's excuse
and reason for refusing to
properly generate these federal
funds to client's, here, rather
requesting financial heating
assistance existed where
defendant's, DAVIS, BRANT, and

NEW GARD, upon a pattern merely
quoted to requesting client's
that the united community
action entity was out of funds!
(This is concisely quoted to
MATHER per phone on the
concise date of January, 5th, 2024,
as to her sincere plea for
emergency hearing assistance!

(27) Pursuant to U.S. Departm-
-ent of Treasury records, a
federal financial grant of
three (3) million dollars was
in fact furnished directly to
the Jackson-Minnesota United
Community action entity during
2022, in a federal grant
application drafted, signed, and
submitted by the United
Community action administrative
and executive personnel, DAVIS,
BRANPT, and, NEWGARD! Note. The
United States Treasury is in
fact the specific federal
agency at which generates the
actual funds to an entity at
which receives a federal
financial grant!

(128) In furtherance of the conspiracy and to effect the illegal object thereof, the following overt acts, among joint defendant's, was in fact committed in the federal district of Minnesota and elsewhere in other foreign states in and within the month's of December, 2023, and in early January, 2024, where the defendant's conspired together, in which to unlawfully conceal federal funds at which were clearly meant for the purpose of providing heating assistance to client's in need during harsh winter month's such as NATHER, in this specific case!

PLAUSIBLE SHOWING HOW THIS PLAINTIFF HAS SUSTAINED INJURY CAUSED BY DEFENDANTS

(129) From at least on December, 4th, 2023, up to including in and upon the concise date of January, 2024, Plaintiff NATHER, in a dire emergency sought assistance as

to her sincere need of paying
a deposit of, \$200.00, to the city
of Jackson Utilities department
from the advertised assistance of
the United Community Action
entity in Jackson - Minnesota,
as the community action corp-
-oration advertised upon local
and out of state television,
radio, internet websites, and
mailed out published news
letter's to local church's, and
numerous charities also in
other foreign states by util-
-izing the United States mail
system, the United Community
Action and its three advertising
personnell, DAVIS, BRANDT, and
NEWGARD, and those parties
most falsely, and frauduently
asserting within the confines
of these outgoing news letter's
that there in fact existed an
emergency fund and a current
and active program for heating
assistance without question in
light of the extreme nature of
such a criteria and the
sincere need for heat!

(30) clearly showing where these here joint defendants, and together have in fact acted with a common purpose to defraud, and of embezzling in the unlawful concealment of federal funds meant for as is stipulated within a false and fraudulent federal grant application in which to assist those in need of emergency heat assistance and or to provide a client with a utilities deposit!

(31) MATHER, was, (a) denied even so much as to an application form in which to fill out as to her showing to United Community Action of Jackson - Minnesota her concise need for obtaining heating assistance, as to a quote made to her by Lacey Davis that this entity was in fact out of funds in which to provide any heating assistance during the remainder of the winter of 2024, however, Davis, Brant, and Newgard, are still yet working within the confines of

the united community action
office each business day and are
 in fact collecting a financial
salary from the same federal
funds at which were clearly meant
 by the federal government to
 serve only a primary purpose of
 assisting those in need of heating
 assistance during harsh winter
 months!!!

(32) There exists a sincere
 issue here where this entity
 and its here named three
 staffing personnel bases a
 promise to the federal govern-
 -ment in light of assisting
 clients here NATHER, with
 money from the granted federal
 funds, and then intentionally
 and with clear knowing fails
 and right out refuses to comply
 and to honor the federal contract
 and its grant does in fact rise
 as clear fraud!!!

(33) (B) MATHER, was further denied to file an administrative appeal as to the corrupt denial of an application form by Lacey Davis, her being denied to even file an appeal at the hands and denied by Supervisory, executive personnell, Newgard, and Brandt, where once again all of these joint defendant's, are in fact responsible for the large volume of false and fraudulent advertising, and news letter's, and have, and still clearly engages into the concealment also of those donations gained by false pretense with clear knowing, here a showing by Plaintiff MATHER, as to concisely how these joint named defendant's are in fact liable for the misconduct alleged!!!

(34) MATHER, here shows concisely how she sustained injury of defendant's enwement into fraudulent interstate commerce, where all points of this fraud existed despite united community actions false promises to

other out of state entities, church's, including those citizen's in a foreign state receiving news letters from Davis, Brandt, and Newgard, and those financial donations and provided funds upon false pretenses of advertising, however, MATHER, is in fact denied her entitled part to access those funds at the corrupt scheme at the hands of joint defendant's!

(35) She, MATHER, suffered loss of heat as to a lengthy time window of seven days in sole result of defendant's severe fraudulent misconduct!

A SHOWING OF DEFENDANTS LIABILITY FOR ALLEGED MISCONDUCT

(36) Plaintiff MATHER, here provides a plausible showing as to how concisely each named defendant is in fact liable for the misconduct alleged! joint defendant's operates on sole federal funds and are all

jointly paid a salary with those
 concise funds, and still yet
 refuses to assist any client's,
 here MATHER, falsely asserting
 that they are out of funds and
 here acts with a common purpose
 to defraud the United States
 government in a federal funding
 scheme, and upon a pattern deprives
 a client, here MATHER, out of
 any hearing assistance at which
 was clearly promised within their
 application for a federal
 financial grant and still
 continues to operate on those
 funds as to personal gain!

(37) They, all three defendant's
 have played a major part in a
 conspiracy in which to elude any
 assistance to MATHER, in a
 scheme of intentionally denying
 MATHER, any access of an
 application, or her right in
 which to appeal the denial of
 an application addressed to a
 supervisor, (Newgard) or to
 executive personnel, (Brandt),
 yet, they all receive a salary
 from the federal grant!

(138) The threat of a continued predicate act of racketeering exists in this specific case, as the denial of assistance to MATHER, is ["ongoing"]!!!

(139) The donations from other church's and charities in other foreign states also pays part of defendant's salary's at which is meant to assist those person's in need of winter emergency heating assistance!

CLAIM ONE

(140) Joint defendant's have clearly engaged into a common scheme in a corrupt avenue in which to unlawfully elude an initial application process in a corrupt turn and twist in a premature denial of heating assistance in a severe process violation of federal funds!

CLAIM TWO

(41) A claim of racketeering is in fact widespread throughout the entirety of this IRICO pleading! civil complaint where it is genuine within ALL causes of action and claims that a ["pattern"] of racketeering exists with a common purpose to defraud!

CLAIM THREE

(42) A claim of unlawful concealment of federal funding, where joint defendant's here named are in fact concealing an initial application process in an corrupt turn and twist in which conceal certain federal funds at which were meant in a federal funding and financial grant application submitted by joint defendant's to assist those persons in need of financial heating assistance!

CLAIM FOUR

(43) AS to a claim of abuse of process, here joint defendant's interfere into a federal funds and federal grant agreement, where the government was so falsely promised that funds and money from that specific grant were to be utilized for the sole purpose of emergency heating assistance to those person's in Jackson-Minnesota during harsh winter month's! To date, those federal assistance funds are denied to all client's and Plaintiff MATHER, in this case! The process of an application for a federally funded program is in fact being denied to Plaintiff MATHER, at the hands of joint defendant's!

CLAIM FIVE

(44) AS to the claim of civil conspiracy, joint defendant's in a conspiratorial predicate act did in clear artifice fabricate a volume of advertisement's at

which they together knew to be untrue and false in the method of television, out of state television commercials, local and out of states news letter's, and internet postings, local and out of state, seeking and receiving financial gain in a clear fraudulent manner! They, joint defendant's also in a conspiracy with knowing and intent, draft a frivolous federal application for a federal grant articulating promises with false pretense!!!

CLAIM SIX

(45) AS to a conspiratorial predicate act with a clear knowing and intent joint defendant's, combined and together, engaged into a corrupt conspired plan and a scheme in which to advise all incoming and inquiring client's, here NATHER, that the community action in Jackson Minnesota was in fact out of federal funds

in which to provide winter heating assistance, yet, all and each of them are still yet working at daily jobs within the confines of the Jackson Minnesota Unit. d Community action entity and are paid their financial salary out of the federal grant program!

CLAIM SEVEN

(46) A claim of a common purpose to defraud rises here where joint defendant's well knew within their application seeking a federal financial grant that the winter heating assistance program was in fact false in an avenue for personal financial gain for the purpose of their office salaries, and those assertions within their federal grant application at which they knew to be untrue and most false! (the term, their office), an enterprise!

CLAIM EIGHT

(47) AS to a claim of conspiracy to commit fraud, joint defendant's conspired together, and engaged into a conspiratorial plan and a scheme in which to fabricate their intentions of a winter heating assistance program within a federal grant application of clear deceit at which they knew to be false!!

CLAIM NINE

(48) AS to a claim of civil violations of the racketeer influenced and corrupt organizations Act, joint defendants combined and together, fabricated a large volume of news letter's, radio advertisement's, television commercial's, internet postings, and even out of state television commercials, including inside the state and out of state mailed out news letter's utilizing the

United states mail service in
which to fabricate and devise
a scheme of statement's
within all of those advertis-
-ement's to cause a person, or
other charities to merely
believe, and to feel sorry for
those Local Jackson Minnesota
United community action client's
suffering extreme and harsh
winter weather without heat
in a corrupt avenue to the hands
of joint defendant's in a scheme
of financial gain in which to
support their office and to
only pay their salaries, their
office existing as a corporate
enterprise!!!

CLAIM TEN

(49) As to a pattern of racket-
-eering, joint defendant's,
have, and still continue
predicate upon in and out of
state church's, charities and
already provided, and continued
to receive a financial federal
grant each year in a continued
scheme only for their offices

financial gain, and to pay
their generous salaries in an
operation of a corrupt enterprise.
 (RICO)!

RELIEF

WHEREFORE, upon the premises
 considered, it is respectfully
 upon this Honorable court for
 the entry of an order of the
 following:

(A) Find this civil complaint
plausible upon its face!

(B) Find that plaintiff has in
 fact shown a cognizable legal
theory upon which this Honor-
-able court can in fact draw a
reasonable inference that the
joint defendants are liable
for the misconduct alleged.

1C1A civil jury trial is so
requested.

(D) Award Plaintiff with actual damage awards as to her suffering the extreme and harsh cold for seven consecutive days and nights of no heat at the hands of joint defendant's intentional failure in which to comply with a federal grant contract in assisting NATHER, with a heat and utility deposit as promised within the initial federal grant application! \$900,000.

(E) Award Plaintiff with punitive damage awards in an amount as may be deemed proper by this Honorable court!

I declare under penalty of perjury the foregoing to be true and correct.

Signed this, 5th, day of January, 2024.

Natalie A. Mather
(SIGNATURE OF PLAINTIFF)